

EXHIBIT 2

From: [Jumper, Maya](#)
To: [Tomezsko, Sara B.](#); [Greene, Cara](#); [Gelfand, Shira Z.](#)
Cc: [Gage, Kenneth W.](#); [Cedar, Christine](#)
Subject: [EXT] RE: Google/Rowe - Diane Greene + Motion for Protective Order
Date: Thursday, November 19, 2020 12:06:24 PM
Attachments: [image001.png](#)

Sara,

For the reasons previously articulated during our meet and confer calls, we cannot agree to forego the deposition of Diane Greene, as she possesses personal knowledge of information relevant to Ms. Rowe's claims. For example, Ms. Greene, as the former CEO of Google Cloud, supervised and had oversight over Ms. Rowe's direct managers, and has information related to and/or directly participated in the hiring process for Stuart Breslow, the hiring process for the Head of Financial Services role, and the hiring process for other roles in OCTO. Additionally, Ms. Greene has direct knowledge of Ms. Rowe's complaints of discrimination and served on the gender equity and diversity council with Ms. Rowe. The declaration submitted by Mr. Shaukat provides further evidence of Ms. Greene's involvement in the decision-making processes challenged in this case. For example, Tariq discussed Ms. Rowe's complaint with Ms. Greene, see Paragraph 14, and Ms. Greene, though not her typical course, still agreed to meet with and consider Ms. Rowe for the Head of Financial Services role, see Paragraph 13.

Based on this evidence, among other documentary evidence, demonstrating Ms. Greene's knowledge, we intend to move forward with her deposition on November 23.

Regards,
 Maya

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From: Tomezsko, Sara B. <saratomezsko@paulhastings.com>
Sent: Tuesday, November 17, 2020 4:39 PM
To: Greene, Cara <CEG@outtengolden.com>; Jumper, Maya <MJumper@outtengolden.com>; Gelfand, Shira Z. <sgelfand@outtengolden.com>
Cc: Gage, Kenneth W. <kennethgage@paulhastings.com>; Cedar, Christine <christinecedar@paulhastings.com>
Subject: Google/Rowe - Diane Greene + Motion for Protective Order

Cara, Shira, Maya –

Attached please find a declaration by Tariq Shaukat in support of a motion for a protective order preventing Diane Greene's testimony, should such a motion be necessary. As you will see, Mr. Shaukat describes his interactions with Ms. Greene concerning both the interview scheduled with Ms. Rowe (ultimately cancelled in light of Ms. Greene's announced departure) and Ms. Rowe's November 7, 2018 email complaint of alleged misleveling upon hire. Given the attached and the deposition testimony you've heard to date, it is clear to us that Ms. Greene has very little (if any) first-hand knowledge of the events underlying Ms. Rowe's claims and, even if she did, it would be cumulative of testimony already in the record.

Please let us know by Thursday, November 19, at noon EST whether you still intend to depose Ms. Greene. If so, we will seek court intervention.

Best regards,
Sara

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HASTINGS

Sara Tomezsko | Associate, Employment Law Department

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